

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

LEONARD L. PATRICK

EEOC # 530-2014-00665

(Enter above the full name of
plaintiff in this action)

v.

WERNER ENTERPRISES

(Enter above the full name of
the defendant(s) in this action)

1:15-CV-0108

CIVIL CASE NO: _____
(to be supplied by Clerk
of the District Court)

**FILED
SCRANTON**

JAN 16 2015

PER M
DEPUTY CLERK

COMPLAINT

1. The plaintiff LEONARD L. PATRICK a citizen of
the County of LANCASTER State of
Pennsylvania, residing at P.O. Box 2571 LANCASTER, PA 17601
wishes to file a complaint under § 704(a) of Title VII of the
Civil Rights Act of 1964 (42 U.S.C. § 2000e-3(a))
(give Title No. etc.)

2. The defendant is WERNER ENTERPRISES

3. STATEMENT OF CLAIM: (State below the facts of your case. If you have paper
exhibits that give further information of your case, attach them to this completed form. Use as
much space as you need. Attach extra sheet(s) if necessary) I BELIEVE the

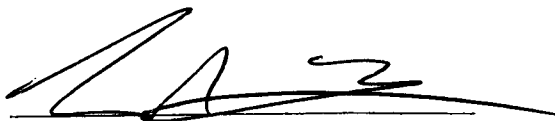
3. (CONTINUED) ^①The Company gave me poor assignments in retaliation for reporting the sexual harassment incident. After being given several terrible assignments, I took it upon my self to investigate for better earnings.

Began driving for a dedicated account "AMERICOLD ACCT". STARTED BRING HOME BETTER CHECKS... I was there 1 wk and a half they told me production slowed I was no longer needed. ^② Kept me sitting in Kentucky

several days when loans were available... ~~WENT~~^{UP} VETANON DRIVER SAID SURPRISED they sent you to the stop... You not being here that long.

4. WHEREFORE, plaintiff prays that ALLOWED TO SHOW ALL

EVIDENCE SHOWING THAT WERNER ENTERPRISE ACTED IN DECEITFUL AND INTENTIONAL WAY TO ^{UP} DETOUR DETER ME ^{UP} FROM FOLLOWING THROUGH WITH FILING CHARGES.


(Signature of Plaintiff)

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

LEONARD L. PATRICK

EEOE# 530-2014-00065

(Enter above the full name of
plaintiff in this action)

CIVIL CASE NO: _____
(to be supplied by Clerk
of the District Court)

v.

WERNER ENTERPRISES

(Enter above the full name of
the defendant(s) in this action)

COMPLAINT

1. The plaintiff LEONARD L. PATRICK a citizen of
the County of LANCASTER State of
Pennsylvania, residing at P.O. box 2571

wishes to file a complaint under TITLE VII of CIVIL RIGHTS
(give Title No. etc.)
Act of 1964 (42 USCS §§ 2000e et seq)
SEXUAL HARASSMENT.

2. The defendant is WERNER
ENTERPRISES

3. STATEMENT OF CLAIM: (State below the facts of your case. If you have paper
exhibits that give further information of your case, attach them to this completed form. Use as
much space as you need. Attach extra sheet(s) if necessary) SEE ATTACHMENTS

I AM AN AFRICAN AMERICAN MAN. I WAS HIRED BY WEBER ENTERPRISE, AN INTERNATIONAL TRUCKING COMPANY, ON APRIL 3, 2013. DURING MY 8 WEEK TRAINING PERIOD, DAVID TOMPKINS ASSAULTED ME IN A SEXUAL MANNER. THIS HAPPENED ABOUT MID-MAY OF 2013. MR. TOMPKINS MADE A COMMENT: "THAT MAKES YOU LOOK GAY." HE ALSO SHOWED ME PHOTOS OF NUDE WOMEN ON HIS PHONE. I SENT MESSAGES TO WEBER ENTERPRISES; THROUGH THE QUALCOMM ADVISING THEM OF HIS CHANGING BEHAVIOR. WHEN MY TRAINING TIME WITH TOMPKINS WAS COMING TO AN END, TOMPKINS SEEMED TO BE STALLING FOR MORE TIME - INCLUDING STOPPING TO DO LAUNDRY IN HARRISBURG, PA. I SLEPT IN THE TRUCK WHILE TOMPKINS DID HIS LAUNDRY. WHEN HE CAME BACK TO THE TRUCK, HE WOKE ME UP AND ASKED ME TO MOVE INTO THE UPPER BUNK. I REFUSED. TOMPKINS THEN REMOVED HIS ATTIRE AND CLIMBED INTO THE BUNK WITH ME, AND RUBBED HIMSELF AGAINST ME. AT FIRST I WAS UNABLE TO GET AWAY AND CALLED A DISPATCHER WHILE ^{UP}KNOWING^{UP} TO EXPLAIN WHAT HAD HAPPENED. THE DISPATCHER WHILE TALKING TO BOTH ME AND MR. TOMPKINS

AT the same time told me to "walk"
home. I took a cab to Harrisburg and
a train to my home in Lancaster, Pa.
I spoke with Cathy at Werner in Allentown
about the incident when she called me
into her offices. I also wrote a statement
as request from Werner Enterprise and
gave it to Cathy for Werner Enterprise.
Cathy also sat in with me on a conference
call with two women from the corporate
office - who told me not to talk about the
incident. After I made this report I received
very poor assignments. My employment ended
August 21, 2013. I believe the company
gave me poor assignments in retaliation for
reporting the sexual harassment incident.

3. (CONTINUED)

1 and 2

4. WHEREFORE, plaintiff prays that

Druid Tompkins: made

threats; Showed me inappropriate materials;
Tampered with Company Equipment; while
Down talking and Demeaning me to make me BUSTUM.
Through calls and messages to Werner Enterprise;
There negligence Allowed MR Tompkins opportunity
To commit said act. I'm seeking Damages...



(Signature of Plaintiff)